

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF TEXAS

**LINDA ROBERTS, on behalf of herself
and all others similarly situated,**

Plaintiff,

V.

**BAPTIST HEALTHCARE SYSTEM,
LLC, BAPTIST HOSPITALS OF
SOUTHEAST TEXAS, and BAPTIST
BEHAVIORAL HEALTH CENTER**

Defendants.

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CIVIL ACTION

CASE NO. 1:20-cv-92-MC

JURY TRIAL DEMANDED

**JOINT MOTION FOR LEAVE TO EXCEED PAGE LIMITATIONS REGARDING
PLAINTIFF'S MOTION FOR COLLECTIVE TREATMENT UNDER 29 U.S.C. § 216(b)**

Plaintiff Linda Roberts (“Plaintiff”), on behalf of herself and all others similarly situated, and Defendants Baptist Hospitals of Southeast Texas and Baptist Behavioral Health Center (“Defendants”) (collectively, the “Parties”) hereby file this agreed and joint Motion for Leave to Exceed Page Limitations Regarding Plaintiff’s Motion for Collective Treatment Under 29 U.S.C. § 216(b).

Under Local Rule CV 7(a)(2), unless leave of court is first obtained, non-dispositive motions are not to exceed fifteen (15) pages (excluding attachments), responses to such motions are not to exceed fifteen (15) pages (excluding attachments), and any reply or sur-reply is not to exceed five (5) pages.

The Parties respectfully request leave from the page limitations under Local Rule CV 7(a)(2) in relation to Plaintiff's anticipated Motion for Collective Treatment Pursuant to 29 U.S.C. § 216(b). The Parties agree that such a motion will necessarily require extensive briefing and

analysis, which necessitate additional pages in excess of the 15-page briefing limits under Rule 7(a)(2). Accordingly, the Parties request the Court grant leave from the page limits under Rule 7(a)(2), and permit the page limits provided for under Local Rule CV 7(a)(1) to apply to Plaintiff's Motion, Defendants' response, and any reply or sur-reply filed related to Plaintiff's Motion.

Under Local Rule CV 7(a)(1), motions shall not exceed thirty (30) pages (excluding attachments), responses to such motions shall not exceed thirty (30) pages (excluding attachments), and any reply or sur-reply shall not exceed ten (10) pages. A proposed Order to this Motion is attached herein.

RESPECTFULLY SUBMITTED AND DATED this 11th day of March, 2021.

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/s/ Robert J. Hambright

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Attorneys for Plaintiff, Class, and Collective Members

CERTIFICATE OF SERVICE

I certify that on March 11, 2021, I filed this document through the Court's CM/ECF system, which will serve a copy on all parties of record.

/s/ William M. Hogg

William M. Hogg